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Attorneys for Defendants
Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan,
Lieutenant General Nadeem Taj
Lieutenant General Ahmed Shuja Pasha

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SHIMON ROSENBERG et al.,	:
	:
	: 1:10-cv-05381
	:
Plaintiff,	:
	:
-against-	:
	:
	: NOTICE OF MOTION TO DISMISS BY
	: DEFENDANTS, INTER-SERVICES
	: INTELLIGENCE DIRECTORATE OF
LASHKAR-E-TAIBA et al.,	:
	: THE ISLAMIC REPUBLIC OF
	: PAKISTAN, AHMED SHUJA PASHA
	: AND NADEEM TAJ
Defendants.	:
	:
	: ORAL ARGUMENT REQUESTED
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KIA SCHERR, Individually, and as Personal	:
Representative of the Estates of Naomi Scherr and	:
Alan Scherr,	: 1:10-cv-05382
	:
Plaintiff,	:
	:
-against-	:
	:
	:
LASHKAR-E-TAIBA et al.,	:
	:
Defendants.	:

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EMUNAH CHROMAN, Individually, and as	:
Personal Representative of the Estate of Ben Zion	:
Chroman,	: 1:10-cv-05448
	:
Plaintiff,	:
	:
-against-	:
	:
	:
LASHKAR-E-TAIBA et al.,	:
	:
Defendants.	:
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PLEASE TAKE NOTICE that, pursuant to Order of the Court as noted on the dockets of these cases on April 13, 2011, and upon the Declaration of Maulvi Anwar ul Haq, sworn to on May 5, 2011, and the exhibit attached thereto, the Declaration of Kevin J. Walsh, sworn to on May 6, 2011, and the exhibits attached thereto, the accompanying Memorandum of Law, and upon the Complaint herein;

Defendants, Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan (“ISI”), former Director General of ISI Lieutenant General Nadeem Taj, and current Director General of ISI Lieutenant General Ahmed Shuja Pasha (collectively “ISI Defendants”), will move this Court, before the Honorable Judge Dora L. Irizarry at the United States Courthouse at 225 Cadman Plaza East, Brooklyn, New York, at 9:30 A.M. on July 14, 2011, or as soon thereafter as counsel can be heard, for an order, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, dismissing the Complaints against the ISI Defendants for lack of subject matter jurisdiction.

Dated: New York, New York
May 6, 2011

LOCKE LORD BISSELL & LIDDELL LLP

By: 

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